

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

ANN ALTMAN,)	
)	
Plaintiff,)	
)	Case No. 4:25-cv-00017
v.)	
)	
SAMUEL ALTMAN,)	
)	
Defendant.)	

**UNDERTAKING PURSUANT TO STIPULATION AND ORDER GOVERNING THE
PRODUCTION AND EXCHANGE OF CONFIDENTIAL AND HIGHLY
CONFIDENTIAL DISCOVERY MATERIAL**

I have read the Stipulation and Order Governing the Production and Exchange of Confidential and Highly Confidential Discovery Material (the “Stipulation”) in the above-captioned action. I understand its terms and agree to be fully bound by them, and I hereby submit to the jurisdiction of the U.S. District Court for the Eastern District of Missouri for purposes of enforcement of the Stipulation.

I further agree not to disclose or use any Confidential Discovery Material or Highly Confidential Discovery Material (as defined in the Stipulation) for purposes other than those permitted under the Stipulation.

Signature

Name

Affiliation

Date

Title